

From: Allen, Meredith  
Sent: 4/11/2013 6:16:17 PM  
To: 'Fugere, Raymond G.' (raymond.fugere@cpuc.ca.gov)  
Cc:  
Bcc:  
Subject: RE: PG&E's Response to Data Request re NERC Alert

Mr. Fugere,

Thank you for the opportunity to review. Below are some comments.

We have identified items that required correction in responses 2.a and 2.c of our data response. Attached is a revised response.

I have also attached a short description of the enhancements that we have made to our processes going forward. The description is also below.

Please let me know if you would like to discuss or would like more information. I apologize for the delay in providing the comments.

Best regards,

Meredith Allen

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**Comments:**

Slide 3 – We thought it would be helpful to make clear that the recommendation is to complete the assessment by each yearend and the utilities are required to provide status reports on July 15 and January 15. The current version could give the impression that a certain portion of the assessment each year is due on July 15 and then January 15.

Slide 4 – We wanted to clarify that we conducted a field visit of every identified issue. We were not sure if that is what was meant by as necessary.

Slide 8 – We had a minor correction to the issues identified and corrected. The issues identified should be 6,897 and the issues corrected should be 1,029. We have also corrected these numbers in the attached data response.

We also thought it would be helpful to provide context for the number of issues corrected. Below are some bullets that address the schedule of mitigation work.

Slide 10 – We did not take this approach to prioritizing mitigation work but understand that this approach was taken by SCE.

### **Mitigation Work:**

- PG&E's goal is to address each discrepancy as quickly as possible, preferably within one year of identifying the issue.
- If PG&E determines that an issue on one of our transmission lines could pose a public safety hazard, we will immediately remedy the situation or will take that line out of service immediately. To date, we have not discovered any public hazards as part of this assessment.
- PG&E is planning to address all of the discrepancies that were identified in 2011 by the end of this year except for 640 discrepancies, which will be addressed by line rebuilds.
- PG&E is targeting 2014 for completion of the vast majority of the work to address discrepancies identified in 2012, but some work will take longer given issues such as

permitting, timing of clearances and the magnitude of scope of work on each circuit.

### **PG&E's Enhanced Transmission Line Clearance Process:**

- When PG&E is constructing a new transmission line or reconductoring or rebuilding an existing line, the engineering design specifications are established such that the conductors' height meets the GO-95 clearance requirements. Once the line is constructed, PG&E's current practice is to have an inspector check the tension, which is then compared with the design calculations to ensure it meets the height requirements. PG&E is planning to enhance this current practice to also conduct a LiDAR analysis of each line after construction. This newly incorporated procedure leverages the precision of the LiDAR tool to ensure the line meets GO 95 clearance requirements and provides PG&E with electronic records of the line ensuring that the electronic database of line measurements is complete.
- PG&E has recently enhanced its existing patrol and inspection program to add additional physical measurements of transmission lines. Previously, physical measurements were conducted when there were obvious signs of change to the conductor clearance. In 2011, in response to the early LiDAR results, PG&E enhanced its annual patrol process to include a physical measurement of the lowest span per mile of line as identified using field knowledge. PG&E has provided a CDM-75<sup>[1]</sup> to every Troublemaker and area Supervisor to complete this work.
- PG&E is also committed to using LiDAR or other available technology in the future to assess transmission line clearances. PG&E is evaluating the appropriate intervals and approach for future clearance assessments once the current assessment is completed later this year.

<sup>[1]</sup> The Cable Distance Meter is a handheld device for measurement of cable sag, cable height distance and overhead clearance of conductors. It is a modern alternative to telescopic measuring poles. The Cable Distance Meter utilizes ultrasonic signals to determine the height of overhead cables up to 75 feet.

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